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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11
MOTORS LIQUIDATION COMPANY, et al., : Case No.: 09-50026 (MG)
f/k/a General Motors Corp., et al., :
:
Debtors. : (Jointly Administered)
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**NOTICE OF FILING OF SECOND RECAST & AMENDED COMPLAINT
FOR DAMAGES BY FOX PLAINTIFF IN CONNECTION WITH
OBJECTION BY STATE COURT PLAINTIFFS TO MOTION BY
GENERAL MOTORS LLC PURSUANT TO 11 U.S.C. §§ 105 AND 363
TO ENFORCE THE BANKRUPTCY COURT'S JULY 5, 2009 SALE
ORDER AND INJUNCTION, AND THE RULINGS IN CONNECTION THEREWITH**

Butler Wooten & Peak LLP (“**BW&P**”), as counsel to the plaintiff in the Fox Lawsuit pending in the Georgia State Court, by and through undersigned counsel hereby respectfully submits this notice in connection with its objection (the “**Objection**”) [Docket No. 13642]¹ to the *Motion by General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Bankruptcy Court’s July 5, 2009 Sale Order and Injunction, and the Rulings In Connection Therewith*, which was filed on June 1, 2016 [Docket No. 13634] (the “**Motion**”).

As indicated in footnote 6 of the Objection, following discussions with counsel to New GM, BW&P has filed the attached Second Recast & Amended Complaint For Damages on behalf of the Fox Plaintiff in the Georgia State Court. *See Exhibit A.* A redline against the previously-filed complaint is attached hereto as *Exhibit B.* For purposes of the Objection, New GM and the Court should take note that in the Amended Fox Complaint the Fox Plaintiff has dropped her request for punitive damages from New GM but retains her Independent Claim for failure to warn (Count 3) against New GM for its own post-sale conduct.

Dated: June 24, 2016

Respectfully submitted,

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¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Objection.